

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EMIGRA GROUP, LLC,

Plaintiff,

--against--

FRAGOMEN, DEL REY, BERNSEN & LOEWY,
LLP, FRAGOMEN, DEL REY, BERNSEN &
LOEWY II, LLP, FRAGOMEN GLOBAL
IMMIGRATION SERVICES, LLC, FRAGOMEN
GLOBAL LLP, AND RYAN MATTHEW FREEL,

Defendants.

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No. 07-cv-10688 (LAK) (HP)

NOTICE OF MOTION TO
ADMIT COUNSEL
PRO HAC VICE

S.D. N.Y. COURT
CLERK
JAN 27 2008

PLEASE TAKE NOTICE that, upon the annexed declarations of C. William Phillips, dated January 24, 2008, and Charles E. Buffon, dated January 21, 2008, and all prior pleadings and proceedings herein, Defendants Fragomen, Del Rey, Bernsen & Loewy, LLP; Fragomen, Del Rey, Bernsen & Loewy II, LLP; Fragomen Global Immigration Services, LLP; and Fragomen Global LLP will move this Court, before the Honorable Lewis A. Kaplan, at the United States Courthouse, 500 Pearl Street, Room 1310, New York, New York as soon as counsel may be heard, for an Order pursuant to Local Civil Rule 1.3(c) of this Court admitting

639749 #25 1-25-08 mg

Charles E. Buffon *pro hac vice* in connection with the above-captioned action, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
January 24, 2008

COVINGTON & BURLING LLP

By: _____

C. William Phillips
Andrew A. Ruffino
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
Tel: 212-841-1000

*Attorneys for Defendants Fragomen, Del
Rey, Bernsen & Loewy, LLP; Fragomen,
Del Rey, Bernsen & Loewy II, LLP;
Fragomen Global Immigration Services,
LLP; and Fragomen Global LLP*

Michael D. Pinnisi, Esq.
PINNISI & ANDERSON, LLP
111 North Tioga Street, Suite 200
Ithaca, New York 14850

Counsel to Plaintiff Emigra Group LLC

Darnley D. Stewart, Esq.
GISKAN SOLOTAROFF & ANDERSON LLP
11 Broadway, Suite 2150
New York, New York 10004

Counsel to Defendant Ryan Freel

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EMIGRA GROUP, LLC,
:
Plaintiff,
:
--against--
:
FRAGOMEN, DEL REY, BERNSEN & LOEWY, No. 07-cv-10688 (LAK) (HP)
LLP, FRAGOMEN, DEL REY, BERNSEN & C. WILLIAM PHILLIPS
LOEWY II, LLP, FRAGOMEN GLOBAL
IMMIGRATION SERVICES, LLC, FRAGOMEN
GLOBAL LLP, AND RYAN MATTHEW FREEL,
:
Defendants.
:
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C. WILLIAM PHILLIPS declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner with the firm of Covington & Burling LLP, counsel for Defendants Fragomen, Del Rey, Bernsen & Loewy, LLP; Fragomen, Del Rey, Bernsen & Loewy II, LLP; Fragomen Global Immigration Services, LLP; and Fragomen Global LLP (the “Fragomen Defendants”) in the above-captioned matter. I was admitted to practice before the U.S. District Court for the Southern District of New York on March 4, 1986 and remain in good standing therein. I submit this declaration in support of the Fragomen Defendants’ Motion to Admit Counsel *Pro Hac Vice* in connection with this action, pursuant to Local Civil Rule 1.3(c) of this Court.

2. I am familiar with Applicant Charles E. Buffon, senior counsel at

Covington & Burling LLP. Mr. Buffon practices law in Covington & Burling LLP's Washington, D.C. office. I believe Mr. Buffon to be an attorney of good character, competence, and experience.

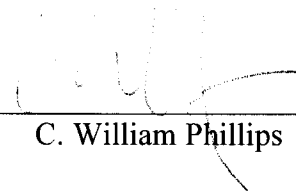
3. With this declaration, I am submitting the Declaration of Charles E. Buffon, describing his experience and knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Evidence, and the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

4. For the foregoing reasons, I respectfully request that the motion be granted.

5. For the Court's convenience, a copy of a proposed order granting the Fragomen Defendants' motion is annexed hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 24th day of January 2008, in New York, New York.



C. William Phillips

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EMIGRA GROUP, LLC,

Plaintiff,

--against--

FRAGOMEN, DEL REY, BERNSEN & LOEWY,
LLP, FRAGOMEN, DEL REY, BERNSEN &
LOEWY II, LLP, FRAGOMEN GLOBAL
IMMIGRATION SERVICES, LLC, FRAGOMEN
GLOBAL LLP, AND RYAN MATTHEW FREEL,

Defendants.

No. 07-cv-10688 (LAK) (HP)

ORDER ADMITTING
COUNSEL *PRO HAC VICE*

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This matter having been brought before the Court by Defendants Fragomen, Del Rey, Bernsen & Loewy, LLP; Fragomen, Del Rey, Bernsen & Loewy II, LLP; Fragomen Global Immigration Services, LLP; and Fragomen Global LLP, through their counsel Covington & Burling LLP, by motion pursuant to Local Civil Rule 1.3(c) for an order admitting Charles E. Buffon *pro hac vice*, on notice to all parties hereto, and the Court having reviewed and considered the papers filed in support of this motion, it is hereby

ORDERED that Charles E. Buffon be and hereby is admitted *pro hac vice* in connection with this action and he shall abide by the provisions of the Local Rules of this Court in all respects and be subject to the disciplinary jurisdiction of the Court in accordance with Local Civil Rule 1.5.

SO ORDERED:

U.S.D.J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
EMIGRA GROUP, LLC,
:
Plaintiff,
:
--against-- No. 07-cv-10688 (LAK) (HP)
:
DECLARATION OF
FRAGOMEN, DEL REY, BERNSEN & LOEWY, CHARLES E. BUFFON
LLP, FRAGOMEN, DEL REY, BERNSEN & :
LOEWY II, LLP, FRAGOMEN GLOBAL
IMMIGRATION SERVICES, LLC, FRAGOMEN :
GLOBAL LLP, AND RYAN MATTHEW FREEL, :
Defendants.
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CHARLES E. BUFFON declares as follows pursuant to 28 U.S.C. § 1746:

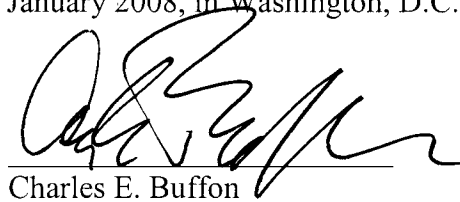
1. I am senior counsel with the firm of Covington & Burling LLP in the District of Columbia and am counsel for Fragomen, Del Rey, Bernsen & Loewy, LLP; Fragomen, Del Rey, Bernsen & Loewy II, LLP; Fragomen Global Immigration Services, LLP; and Fragomen Global LLP (the “Fragomen Defendants”) in the above-captioned matter.
2. I submit this Declaration in support of the Fragomen Defendants’ Motion to Admit Counsel *Pro Hac Vice* in connection with this action pursuant to Local Civil Rule 1.3(c) of this Court.
3. I have been admitted to practice in the District of Columbia since February 4, 1965, and I am currently in good standing in the Bar of the District of Columbia. My D.C. Bar number is 29983. A certificate of good standing from the District of Columbia Court of Appeals is annexed hereto as Exhibit A.

4. I have read and am familiar with (a) the provisions of the Judicial Code which pertain to the jurisdiction of, and practice in, the United States District Courts; (b) the Federal Rules of Civil Procedure; (c) the Federal Rules of Criminal Procedure; (d) the Federal Rules of Evidence; and (e) the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

5. I will faithfully adhere to all rules applicable to my conduct in connection with any activities before this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 21st day of January 2008, in Washington, D.C.



Charles E. Buffon



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

Charles E. Buffon

was on the 4th day of February, 1965

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on January
17, 2008.

GARLAND PINKSTON, JR., CLERK

By: *A. Chait*
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EMIGRA GROUP, LLC,
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Plaintiff,
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--against-- No. 07-cv-10688 (LAK) (HP)
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FRAGOMEN, DEL REY, BERNSEN & LOEWY, ECF CASE
LLP, FRAGOMEN, DEL REY, BERNSEN &
LOEWY II, LLP, FRAGOMEN GLOBAL
IMMIGRATION SERVICES, LLC, FRAGOMEN
GLOBAL LLP, AND RYAN MATTHEW FREEL,
:
Defendants.
----- x

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the foregoing **NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE** (dated January 24, 2008), **DECLARATION OF CHARLES E. BUFFON** (dated January 21, 2008), **DECLARATION OF C. WILLIAM PHILLIPS** (dated January 24, 2008), and **PROPOSED ORDER** to be served by First Class Mail upon the following attorneys of record to the within action (07-cv-10688 (LAK) (HP)) in accordance with Rule 5 of the Federal Rules of Civil Procedure on this 25th day of January, 2008:

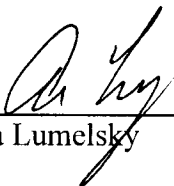
Darnley D. Stewart, Esq.
GISKAN SOLOTAROFF & ANDERSON LLP
11 Broadway, Suite 2150
New York, New York 10004

Counsel to Defendant Ryan Freel

Michael D. Pinnisi, Esq.
PINNISI & ANDERSON, LLP
111 North Tioga Street, Suite 200
Ithaca, New York 14850

Counsel to Plaintiff Emigra Group LLC

Dated: New York, New York
January 25, 2008



Anna Lumelsky